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of Counsel

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August 24, 2020

The Honorable Valerie E. Caproni, U.S.D.J.  
 United States District Court  
 Southern District of New York  
 40 Foley Square  
 New York, New York 10007

**Re: Otero v. Verizon New York Inc., et al. Case No.:20-cv-05126-VEC**

Dear Judge Caproni,

This office represents plaintiff in the captioned civil matter. This matter is on the Court's calendar for an Initial Pretrial Conference on August 28, 2020. We write on our own behalf and on behalf of defendants Verizon New York Inc. and Receivables Performance Management, LLC to request respectfully a 30-day adjournment of the conference.

The reason for the adjournment request is that the parties are exploring a settlement of the matter. Plaintiff now awaits word from defendants in response to settlement demands. We also respectfully request a concomitant extension of time for the filing of the pre-conference materials.

We have not heard from counsel for defendant Ceteris Portfolio Services, LLC d/b/a North Shore Agency today, and believe that may be as a result of tropical storm systems now affecting Louisiana. In addition, defendant Collecto, Inc. d/b/a EOS CCA has not yet appeared or answered and has not otherwise been heard from by plaintiff.

We thank the Court for your kind consideration of the foregoing requests.

Respectfully Submitted,  
**FAGENSON & PUGLISI, PLLC**

By: /s/ Novlette R. Kidd

NOVLETTE R. KIDD, ESQ.

Application GRANTED. The Initial Pretrial Conference scheduled for August 28, 2020 is adjourned and rescheduled for **October 2, 2020, at 11:30 a.m.** The parties' joint letter and proposed Case Management Plan is due no later than **September 24, 2020.**

SO ORDERED.



08/25/2020

HON. VALERIE CAPRONI  
 UNITED STATES DISTRICT JUDGE